

1 RICHARD A. HARRIS, ESQ.
Nevada Bar No. 505
2 MICHAEL I. SANDOVAL, ESQ.
Nevada Bar No.: 13242
3 **RICHARD HARRIS LAW FIRM**
801 South Fourth Street
5 Las Vegas, Nevada 89101
6 Phone: (702) 444-4444
Fax: (702) 444-4455
7 E-Mail: Michael@RichardHarrisLaw.com
8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MAYRA AGUIRRE-ORTIZ, individually,
12 Plaintiff,

13 vs.
14

15 SMITH'S FOOD AND DRUG STORE a/k/a
16 KROGER and DOES I-V, and ROE
CORPORATIONS, I-V, inclusive,
17 Defendants.

CASE NO.: 2:20-cv-00009-RFB-BNW

**STIPULATION FOR EXTENSION OF
DISCOVERY DEADLINES (SECOND
REQUEST)**

18 The above named parties submit the following Stipulation for Extension of Discovery
19 Deadlines (First Request).
20

21 **A. DISCOVERY COMPLETED TO DATE**

22 This matter involves a slip and fall at one of defendant's local store branch locations.
23 On January 23, 2020, the parties held an initial Rule 26(f) Conference. February 10, 2020, the
24 Court entered a stipulated discovery plan and scheduling order. Plaintiff and Defendants have
25 served their initial disclosure of witnesses and documents. Defendant has propounded a written
26 discovery upon Plaintiff. Defendant has deposed Plaintiff. Plaintiff is in the process of deposing
27 Defendant.
28

B. DISCOVERY THAT REMAINS TO BE COMPLETED

The parties need to designate expert witnesses and conduct the depositions of the expert witnesses. Plaintiff needs to conduct the deposition of a representative of defendant and the depositions of defendant's employees who have information regarding the incident. Defendant needs to designate a Rebuttal Expert Witness. Plaintiff needs to designate a Rebuttal Expert Witness.

C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED

The state of emergency and resulting Court orders regarding COVID-19 have impacted the parties' ability to conduct discovery. Specifically, due to truncated office hours, the parties need additional time to secure their respective expert witnesses and additional time for the same to complete their expert reports. In addition, the previously assigned Plaintiff attorney, is no longer with the Richard Harris Law Firm and was recently re-assigned to the new Plaintiff attorney, Michael I. Sandoval, Esq. Finally, the pandemic has caused delays with procuring dates for certain depositions. The parties did not request the instant extension of the discovery deadlines sooner than twenty-one days before the current discovery deadline as the parties did not realize until after that time that they would not be able to complete sufficient factual discovery to allow their experts to adequately prepare their reports prior to the current expert witness disclosure deadline.

Accordingly, the parties request that the Court extend the current discovery deadlines ninety days.

D. PROPOSED DISCOVERY SCHEDULE

Close of Discovery:	December 21, 2020.
Dispositive Motions:	January 20, 2021.
Joint Pre-Trial Order:	February 19, 2021.
Last day to amend pleadings:	Closed.
Initial Expert Disclosures:	Closed.

Rebuttal Expert Disclosures: Closed.

Interim Status Report Closed.

DATED this 2 day of October, 2020.
RICHARD HARRIS LAW FIRM

DATED this 2 day of October, 2020.
COOPER LEVENSON, P.A.

/s/ Michael Sandoval

/s/ Andre T. Marques

MICHAEL I. SANDOVAL, ESQ.
Nevada Bar No. 013242
801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

ANDRE T. MARQUES ESQ.
Nevada Bar No. 14737
JERRY S. BUSBY, ESQ.
Nevada Bar No. 1107
3016 W. Charleston Blvd., Suite 195
Las Vegas, Nevada 89102
Attorneys for Defendant

IT IS SO ORDERED.

Dated this 6th day of October, 2020.


UNITED STATES MAGISTRATE JUDGE